

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

Diane Johnson,)	
)	
Plaintiff,)	Civil Case No. 4:15-cv-04370-RBH
)	
v.)	
)	
Comcast Cable Communications, LLC, and)	
Credit Control Services, Inc. d/b/a Credit)	
Collection Services,)	
)	
Defendants.)	
)	

**DEFENDANT COMCAST CABLE COMMUNICATIONS, LLC'S
RESPONSES TO S.C. LOCAL RULE 26.01 INTERROGATORIES**

Pursuant to S.C. Local Civil Rule 26.01, Defendant Comcast Cable Communications, LLC ("Comcast") answers as follows:

- (A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: Comcast is not aware of any at this time.

- (B) As to each claim, state whether it should be tried jury or non-jury and why.

ANSWER: Plaintiff has requested a jury trial. Therefore, the matter should be tried by a jury.

- (C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of

the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: Comcast Cable Communications, LLC is not a publicly owned company, but its parent company, Comcast Corporation, is publicly traded. No publicly held corporation owns 10% or more of Comcast Corporation's stock. Comcast Cable Communications, LLC does not own 10% or more of any publicly owned company.

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: The subject case was filed in the Florence Division of the United States District Court for the District of South Carolina as Plaintiff allegedly resides therein. Comcast asserts this division is inappropriate for an action against Comcast as this Court, pursuant to Rule 12(b)(2), does not have personal jurisdiction over Comcast.

- (E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: No.

- (F) If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: “Comcast Cable Communications, LLC” is properly identified.

- (G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting the claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: Comcast asserts Plaintiff and the individual that allegedly opened a fraudulent account with Comcast may have liability for action or inaction related to Plaintiff’s claims. Beyond Plaintiff and the above-described individual, Comcast is not aware of any other such person or legal entity at this time.

Respectfully submitted,

December 22, 2015.

/s/ Chad V. Echols
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ATTORNEYS FOR DEFENDANT

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Defendants.)	
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The undersigned certifies that **Comcast Cable Communications, LLC's Responses to S.C. Local Rule 26.01 Interrogatories** was served upon Plaintiff via counsel on the 22nd day of December, 2015 by electronic mail through the Clerk of Court's ECF System addressed as:

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Attorney for Plaintiff

/s/ Chad V. Echols

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